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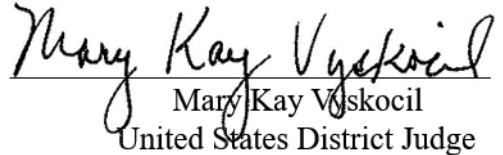
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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/17/2021

Granted. SO ORDERED.

Date: 3/17/2021
New York, New York


Mary Kay Vyskocil
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARTIN NICHOLAS JOHN TROTT
and CHRISTOPHER JAMES SMITH,
on behalf of and solely in their capacity
as the Foreign Representatives and Joint
Official Liquidators of MADISON
ASSET LLC (IN LIQUIDATION),

Case No. 1:20-cv-10299-MKV

Plaintiffs,

-against-

DEUTSCHE BANK AG,

Defendant.

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MOTION TO FILE REDACTED AMENDED COMPLAINT

Martin Nicholas John Trott and Christopher James Smith (“Plaintiffs”), as the Foreign Representatives and Joint Official Liquidators of Madison Asset LLC (“Madison”), a Cayman investment fund that is now in official liquidation proceedings before the Grand Court of the Cayman Islands, submit this motion for entry of an order that the Plaintiffs’ Amended Complaint

against Deutsche Bank AG (“Defendant”) be filed in redacted form, pursuant to Section 6 of the SDNY Electronic Case Filing Rules and Instructions, Rule 9 of this Court’s Individual Rules of Practice in Civil Cases, and SDNY Standing Order 19-mc-0583.

BACKGROUND

Pursuant to the Court’s Order dated December 16, 2020 (ECF No. 11), Plaintiffs must file their Amended Complaint today. This case was initially filed as an adversary proceeding in the United State Bankruptcy Court for the Southern District of New York, relating to the Chapter 15 proceeding for Madison overseen by Judge Michael E. Wiles. Plaintiffs filed their original Complaint in redacted form based on Defendant’s assertion that certain information, which Defendant had provided the JOLs during bankruptcy proceedings, was protected by a confidentiality agreement between the parties. After a telephonic hearing with the parties about the permissible scope of redactions, Judge Wiles orally specified the information to be redacted and memorialized that directive in a written Order dated November 19, 2020 (Bankruptcy Court ECF No. 15). That Order is attached hereto as Exhibit A. Plaintiffs subsequently filed a version of their Complaint (Bankruptcy Court ECF No. 16) that was redacted pursuant to Judge Wiles’ order.

REQUESTED RELIEF

Plaintiffs are prepared to file in this Court their Amended Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure and this Court’s December 16, 2020 Order (ECF No. 11). Plaintiffs move to file the amended complaint in redacted form that complies with Judge Wiles’ Order and instructions.

Dated: New York, New York
January 29, 2021

REID COLLINS & TSAI LLP

/s/ Jeffrey E. Gross

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re
MADISON ASSET LLC,

Debtor in a Foreign Proceeding.

Chapter 15 Case

Case No. 18-12814 (MEW)

MARTIN NICHOLAS JOHN
TROT and CHRISTOPHER
JAMES SMITH, on behalf of and
solely in their capacity as the Foreign
Representatives and Joint Official
Liquidators of MADISON ASSET
LLC (IN LIQUIDATION),

Adv. Proc. No. 20-01237 (MEW)

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

ORDER GRANTING MOTION TO FILE COMPLAINT UNDER SEAL

Upon consideration of Plaintiffs' Motion to File Under Seal Pursuant to Bankruptcy Rule 9018, Local Rule 9018-1, and Section 107(B) of the Code (the "Motion"),

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The unredacted version of the Complaint submitted on October 14, 2020 for filing under seal is deemed to be filed on such date.
3. The Plaintiffs may file the redacted version of the Complaint, attached hereto as Exhibit A, on the public docket.

Dated: November 19, 2020

s/Michael E. Wiles

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE